

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

R2 SOLUTIONS LLC,

Plaintiff,

v.

DATABRICKS, INC.,

Defendant.

Civil Action No. 4:23-cv-01147-ALM

**JURY TRIAL DEMANDED**

**DECLARATION OF ABHINAV TANEJA IN SUPPORT OF DEFENDANT'S  
REPLY TO ITS MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF  
CALIFORNIA**

[REDACTED]

I, Abhinav Taneja, declares as follows:

1. My name is Abhinav Taneja. I have personal knowledge of and am competent to testify as to the facts herein. I have been an employee at Databricks, Inc. (“Databricks”) since 2021. I am currently Vice President of Research & Development Operations (“R&D Operations”) of Databricks. In my role as Databricks’ Vice President of R&D Operations, I am familiar with Databricks’ research, development, design, marketing, distribution, and sales of its products and services. I am based in the San Francisco Bay Area, California.

2. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. [REDACTED]

[REDACTED]

---

<sup>1</sup> The opposition identifies “Giri Raratharajan” and “Giri Varatharajan”, but no such individuals are employed at Databricks.

<sup>2</sup> [REDACTED]

<sup>3</sup> [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Mountain View, California, on June 21, 2024.

Abhinav Taneja  
Abhinav Taneja